

FILED

Judge Leonie M. Brinkema

United States of America v. Mohammed Chhipa

Case No: 1:23-cr-97

2024 JAN 12 P 1:37

Motion to Extend Deadline

Dear Judge Brinkema,

I, Mohmmmed Chhipa the defendant in the above-mentioned case, respectfully submit this Motion to Extend Deadline for the following reasons:

1. Incomplete Discovery:

The defendant, Mohmmmed Chhipa has not yet received full discovery in this case. The incomplete discovery has impeded their ability to adequately prepare a defense. The information yet to be disclosed is critical to a fair and just resolution of this matter.

2. Change of Counsel Without Consent:

The defendant was provided with new legal representation without their consent. This unexpected change in counsel has necessitated additional time for the new attorney to familiarize themselves with the case and adequately represent the defendant's interests.

3. Inadequate Time to Review Discovery:

The defendant has not been provided with sufficient time to review the available discovery materials. The complexity of the case and the volume of information demand a more extended period for the defendant to thoroughly review and prepare their defense.

In light of these circumstances, I respectfully request an extension to allow for the completion of discovery, accommodation for the change in legal representation, and adequate time for the defendant to review the discovery materials.

I believe that an extension of the deadline is necessary to ensure a fair and just resolution of this case. Granting this motion will serve the interests of justice and uphold the principles of due process. As of now my new counsel has not visited me or spoken to me (January 15th is holiday).

Thank you for your attention to this matter. I kindly request that the court schedule a hearing at the earliest convenience to address this motion.

Alexandria, Virginia

1/12/2024

